

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

The Ruins, LLC,

Debtor.

Case No.: 25-30004

Chapter 11

NOTICE OF EXPEDITED MOTION TO CONVERT

TO: ALL CREDITORS AND INTERESTED PARTIES:

NOTICE IS HEREBY GIVEN that Red River State Bank ("Creditor") has filed a Motion to Convert, a copy of which motion is annexed hereto and herewith served upon you.

NOTICE IS FURTHER GIVEN that Creditor has requested relief on an expedited basis pursuant to Federal Rule of Bankruptcy Procedure 9006 and Local Rule 9006-1.

NOTICE IS FURTHER GIVEN that written objections to said motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court, whose address is 655 First Avenue North, Suite 210, Fargo, ND 58102-4932, with a copy mailed to counsel for Creditor, whose name and address is listed below. Any objections not filed and served may be deemed waived.

Dated: September 26, 2025

VOGEL LAW FIRM

BY: /s/ Kesha L. Tanabe
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ATTORNEYS FOR RED RIVER STATE BANK

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In Re:	Case No.: 25-30004
The Ruins, LLC,	Chapter 11
Debtor.	

MOTION TO EXPEDITE

Red River State Bank (the “Creditor”), by and through counsel, hereby moves this Court for an expedited hearing, pursuant to Federal Rule of Bankruptcy Procedure 9006(c) and Local Rule 9006-1, to convert the above-captioned case from Chapter 11 to 7 pursuant to 11 U.S.C. § 1112(b) and Federal Rules of Bankruptcy Procedure 1017(f) and 9014 (the “Motion”). In support of this Motion, Creditor states as follows:

JURISDICTION

1. The Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. Venue is proper under 28 U.S.C. §§ 1408 and 1409.
4. The basis for the relief requested herein is 11 U.S.C. § 1112(b), Rules 1017(f)(1), 9006, and 9013, and Local Rule 9006-1 and 9013-1.

REQUEST FOR EXPEDITED RELIEF

5. Creditor requests expedited relief for the reasons set forth herein and the accompanying Declaration of Charles Aarsted filed in support of this Motion (the “CRA Declaration”)

6. Creditor respectfully suggests that the relevant parties in interest, including the Debtor, experts and witnesses, are currently prepared for hearing beginning on Monday, September 29-30, 2025.

7. Alternatively, the Motion could be heard on Friday, October 3, 2025, which is seven calendar days after the filing date of this Motion.

8. Rule 9006(d) requires notice of a hearing on the Motion to be served at least 7 days before the hearing date. Local Rule 9013-1 allows a longer 14-day notice period for all contested matters.

9. Rule 9006(c), however, permits this court to reduce the notice period. Local Rules 9006-1 and 9013-1 further contemplate that the Motion could be heard on an expedited basis, provided witness lists and exhibits have been disclosed no later than 2 business days prior to the hearing.

10. Creditor respectfully submits that the circumstances here support the request for expedited relief and mitigate any potential prejudice to Debtor. Debtor and Creditor have recently exchanged extensive discovery in accordance with this Court's Discovery, Scheduling and Prehearing Order (the "Discovery Order") [ECF 56].

11. As required by the Discovery Order and local rule, Creditor has already disclosed the exhibits and witnesses it would rely upon at a hearing on September 29-30, 2025. [ECF 104-105, ECF 87-91, 96-98, 101-102]. Creditor intends to utilize the same witnesses and exhibits, if allowed to proceed on this Motion.

12. For all the foregoing reasons, Creditor requests that the parties be permitted to go forward on the Motion on Tuesday, September 30, 2025 or Friday, October 3, 2025.

CONCLUSION

WHEREFORE, Creditor respectfully requests that this Court grant a hearing on an expedited basis to consider its motion convert this case from Chapter 11 to 7.

Dated: September 26, 2025.

VOGEL LAW FIRM

BY:

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ATTORNEYS FOR RED RIVER STATE
BANK

VERIFICATION

I, Charles Aarestad, Vice President of Creditor, based on my personal information and belief, declare under penalty of perjury that the facts set forth in the preceding Motion are true and correct, according to the best of my knowledge, information and belief.

Dated: _September 26, 2025

Signed: /s/ Charles Aarestad

Charles Aarestad